

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**RACHEL RENA MADDUX, et al.,**

**Debtors,**

**v.**

**MIDLAND CREDIT MANAGEMENT, INC.,  
as Agent for MIDLAND FUNDING, LLC,**

**Creditor.**

**Consolidated Contested Matters  
Case Nos. 15-33574, 15-33590,  
15-34358, 15-34453, 15-35437,  
15-36032**

**NOTICE OF MOTION AND NOTICE OF HEARING**

**PLEASE TAKE NOTICE** that on December 15, 2016, Midland Credit Management, Inc., as Agent for Midland Funding, LLC (“Midland”), by and through their undersigned counsel, filed the *Motion of Midland Credit Management, Inc., as Agent for Midland Funding, LLC, to Amend, Clarify and/or Make Additional Findings Pursuant to Bankruptcy Rule 7052* [ECF No. 140] (the “Motion”) with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “Court”):

**PLEASE TAKE FURTHER NOTICE** that your rights may be affected. You should read the Motion carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one).

**PLEASE TAKE FURTHER NOTICE** if you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your views on the Motion, then, by **January 18, 2017** (the “Objection Deadline”), you or your attorney must:

- ☒ File with the Court, either electronically or at the address shown below, a written response to the Motion pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia. If you mail your written response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the Objection Deadline.

**If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Motion as conceded and enter an appropriate order granting the requested relief without further notice or hearing.**

Clerk of the Court  
United States Bankruptcy Court  
701 East Broad Street  
Suite 4000  
Richmond, VA 23219

☒ Attend a hearing before the Honorable Kevin R. Huennekens, United States Bankruptcy Judge, at **2:00 p.m. (prevailing Eastern Time) on Wednesday, January 25, 2017**, at the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, 701 East Broad Street, Room 5000, Richmond, Virginia 23219.

Dated: December 16, 2016

Respectfully submitted,

/s/ Tyler P. Brown

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*Counsel to Midland Credit Management, Inc., as  
Agent for Midland Funding, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 16, 2016, a true and accurate copy of the foregoing was served via First Class U.S. Mail (postage prepaid), via e-mail or via the Electronic Case Filing (ECF) system, as appropriate and as indicated, on the following parties:

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/s/ Tyler P. Brown  
Tyler P. Brown

[\*Indicates service by ECF or e-mail. All others served by First Class U.S. Mail, postage prepaid.]